Dell Inc. Promoting the Safe Management of Used Electronics July 20, 2011

Purpose

- Dell Inc. wants to improve the safe management of used electronics and is taking concrete steps to do so.
- Dell Inc. believes such efforts should emphasize transparency, measurement, tracking, and building public awareness through outreach.

Principle of Certified Recycling

- Dell Inc. believes that accredited electronics recycling standards are setting a meaningful floor for quality and environmental protection.
- Dell Inc. promotes the use of third-party certified electronics recyclers.

Actions

Use of Certified Recyclers

o Dell Inc. commits to work to achieve a goal of managing 100 percent of used electronics collected through third-party certified recyclers by 2014.

Going "Above and Beyond" Current Standards

- o Until third-party certification programs are more fully implemented, Dell Inc. commits to go above and beyond implementation of the current certification programs by:
 - ➤ Requiring all recycling facilities used to fully account for used electronics entering and leaving each facility from first entry into the system to final disposition (e.g., mass balance);
 - ➤ Conducting due diligence to ensure that the certified recycler of first entry into the system as well as facilities receiving materials *after* the initial certified recycler (i.e., downstream facilities) are also certified to an established third-party certification electronics recycling standard or are examined by the company's auditors at least semi-annually to ensure safe management practices.

Transparency and Accountability

- Dell Inc. commits to disclose key data to the U.S. Environmental Protection Agency and to post it on a website in a public and transparent manner. Within 30 days of today, Dell Inc. will provide and post the information for the previous calendar year as a baseline and will update the data annually thereafter. The information will include:
 - > Volume of electronics collected from businesses and institutions and, separately, volume collected from consumers.
 - ➤ Volume of used electronics equipment¹ collected, including volume collected from leasing transactions, warranty-returns, and asset management, which may be aggregated. If items such as toner and accessories (e.g., cables, keyboards, and mice) are reported, such data will be separate from data for equipment and mobile devices.
 - > Total volume of used electronics recycled by state.

^{1.} For purposes of reporting, "equipment" will include computers, monitors, printers, TVs, gaming systems and the like. Mobile devices such as cell phones will be reported separately.

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- > Volume of used electronics recycled at third-party certified recyclers (for which each recycling facility being used will be certified).
- > Any Dell Inc. standards or policies for vendors that go beyond the certification program standards.
- > Dell Inc. will also provide to EPA the name of the recyclers used and certification status and certification program or will post and maintain such information publicly.
- o Using the data obtained in the baseline reporting above, Dell Inc. commits to set and share publicly yearly milestone goals for a three year period for the following elements:
 - > Yearly targets to meet the goal of having 100 percent of used electronics that are collected (including leasing transactions, warranty returns, asset management, etc.) be processed by accredited third-party certified recyclers.
 - Efforts to continuously improve the amount and detail of data on the volume of electronics sent to downstream accredited, third-party-certified recycling facilities.
 - Efforts to continuously increase collection opportunities (i.e., permanent collection points and programs, etc.) using accredited, third-party-certified recycling providers, adapting the access based on local infrastructure and policies.
 - Efforts to continuously provide consumers with specific, local information about collection opportunities that use accredited, third-party certified recyclers.
 - Efforts to communicate to and educate the public on safe management of used electronics and available certified recycling options.
 - > Efforts to champion practices that go above and beyond to other industry stakeholders.

Supporting the National Strategy

Supporting the National Strategy	
 Dell Inc. intends to participate as EF 	A implements its strategy to advance the safe
- management of pred electronics, and	d to encourage others to do so.
2110101) 1,20th 2011
Michael Dell, CEO	Date /
Dell Inc.	